

# EXHIBIT “A”

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November 30, 2017

**BY HAND DELIVERY**

The Port Authority of New York and New Jersey  
Law Department  
4 World Trade Center  
150 Greenwich Street, 23<sup>rd</sup> Floor  
New York, New York 10007

Re: **Notice of Claim**

To the Law Department:

This firm represents CWA Local 1032 and Charlene Talarico. Attached please find a Notice of Claim filed by Charlene Talarico and all others similarly situated. Please do not hesitate to contact this firm if you wish to discuss.

Very truly yours,

Sarai K. King

Cc: Charlene Talarico  
Hetty Rosenstein, Area Director, CWA New Jersey  
Patrick Kavanaugh, President, CWA Local 1032

CLAIMS ADMINISTRATION &  
RISK MANAGEMENT  
2017 NOV 30 P 3:19  
THE PORT AUTHORITY OF NY & NJ  
LAW DEPARTMENT

2017 NOV 30 P 1:34  
PORT AUTHORITY OF NY & NJ  
OFFICE OF THE SECRETARY

**NOTICE OF CLAIM**

-----X

In the Matter of the Claim of

Charlene Talarico and All Others Similarly Situated

- against -

Port Authority of New York and New Jersey

-----X

To: The Port Authority of New York & New Jersey  
4 World Trade Center  
150 Greenwich Street  
New York, New York, 10007

PLEASE TAKE NOTICE that the undersigned claimant hereby makes claim and demand against you as follows:

1. Name and post office address of each claimant and claimant's attorney is:

CHARLENE TALARICO  
207 Lawrence Drive  
Paramus, New Jersey 07652

Weissman & Mintz, LLC  
1 Executive Drive, Suite 200  
Somerset, New Jersey 08873

2. Nature of claims:

The Port Authority's, its agents, employees, and any affiliates' covert video surveillance of Charlene Talarico and other employee medical exams violated the Fourth and Fourteenth Amendments of the United States Constitution, Article 1, section 12 of the New York State Constitution, and section 203-c of the New York Labor Law.

3. The time when, the place where, and the manner in which the claim arose:

On or about February 2, 2017, Charlene Talarico, a Port Authority employee, viewed a video recording provided by the Port Authority as discovery in connection with a separate and unrelated criminal matter, which revealed that the Port Authority had recorded her medical examination at the Office of Medical Services, then located at 233 Park Avenue South, New York, New York, 10003. Ms. Talarico was unaware of this recording until on or about February 2, 2017 when she received and viewed a copy of the recording.

As other employees of the Port Authority were also sent to the same Office of Medical Services during this same period of time, their examinations were also likely subject to video surveillance.

4. Damages suffered:

Ms. Talarico sustained severe emotional distress as a result of her medical examination having been recorded.

You are hereby notified that the Claimant intends to file an action for these claims.

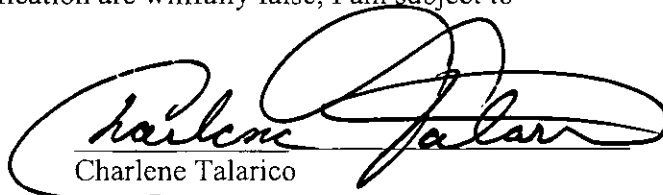
### CERTIFICATION

I, Charlene Talarico hereby state as follows:

1. I am the Claimant named in the Notice of Claim.
2. The contents of the Notice of Claim are true and correct to the best of my knowledge.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me in this Certification are willfully false, I am subject to punishment.

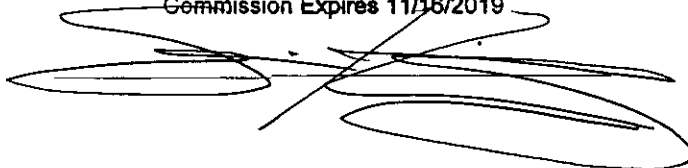
Date: 11/30/17

  
Charlene Talarico

NOTARY PUBLIC:

Date: Nov. 30, 2017

**SARAI KING**  
Notary Public - State of New York  
No. 02KI6332985  
Qualified in King's County  
Commission Expires 11/16/2019



My commission expires: Nov. 16, 2019